

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE: GRANULATED SUGAR
ANTITRUST LITIGATION

MDL No. 24-03110 (JWB/DTS)

This Document Relates To:

All Actions

**APPLICATION OF ROBERT J. BONSIGNORE TO SERVE ON
PLAINTIFFS' STEERING COMMITTEE**

I, Robert J. Bonsignore, respectfully submit this application to serve on the Plaintiffs' Steering Committee (the "PSC") in the above captioned action. I commit to assisting to lead this case to a successful resolution and fulfilling all the duties and responsibilities outlined by the Court in ¶ 1(B)(i)(a)-(c) of PTO No. 3. This Court may find the following supportive factors of interest:

1. My primary focus for the last ten (10) years has been to serve as Lead Counsel in MDL 2566 In re TelexFree Litigation. Judge Nathaniel Gorton has scheduled a certain end in March of 2025. I have the time necessary to fulfill the PSC duties.
2. My small, boutique law firm is well-staffed, deeply resourced and will carry out roles we are assigned by lead counsel. We will not seek to otherwise place great numbers of lawyers into the litigation. I do not present with a noteworthy need to feed overhead.
3. I am quite capable of handling what we are assigned. For example, I was assigned to defend the deposition of twenty-four (24) Clayton Act plaintiffs in June of 2023. In another case, I was assigned to take or defend nine (9) MDL expert depositions within a court ordered thirty (30) day time frame. Between January 18, 2024, and May 31, 2024, I took nineteen (19) MDL fact witness depositions. I/each member of my firm pride ourselves on being work horses.
4. I have led many local, state and national bar associations. I have been awarded many competitive, merit-based lawyer recognitions. I have worked on dozens of cases as a grunt lawyer, PSC member and Lead Counsel. I am constantly asked

- to join or assist in cases. I am regularly consulted by lawyers, government, former clients, and businesses to work with or for them. I drafted the State of Rhode Island's purchaser antitrust statute and advised the City of Providence, Rhode Island throughout the legislative process. Recently, was retained to work cooperatively with co-counsel and opposing counsel in the matter of *Veeva Systems, Inc. v. IQVIA, Inc.* (2:17-cv-00177-JXN (D.N.J. Jan. 12, 2022)). The issues in this complex case revolve around IQVIA's tactics to retain monopoly control of data crucial to the life sciences industry and use that position to extend its monopoly into the software market.
5. I have thirty years of experience in antitrust, consumer protection, complex litigation, multi-district litigation, Judicial Panel on Multi-District Litigation proceedings, and commercial cases and in the process demonstrated my professionalism, competence, fairness, within the antitrust bar. My experiences and the composition of my law firm will provide a benefit and inject a fresh perspective on the PSC.
 6. My experience driven "can do" approach to litigation is evidenced by service as Lead Counsel in MDL 2566, *In re: TelexFree Securities Litigation*, (a pyramid scheme involving the largest number of victims in United States history). Between July 1, 2020, and November 2023 alone, the MDL 2566 Plaintiffs fully researched, briefed and filed 105 motions, memorandums, replies, declarations, oppositions, and affidavits totaling 1,452 pages and served against 30 defendants. During this same period, the MDL 2566 Plaintiffs filed 11 motions

to compel, including 22 memorandum, sur-replies, affidavits, and oppositions against 11 defendants totaling 328 pages and including 1,315 pages of exhibits. Most recently, a \$95,450,000.00 settlement was reached with numerous defendants, which added to prior settlements totaling an additional \$24,600,000.00.

7. I was requested to serve as trial counsel in each of the above cases. In addition, I was extensively involved in trial preparation in cases against tobacco manufacturers and was counsel of record for the former Governor of California as well as Orange and Los Angeles counties. I was retained by nine (9) of ten (10) counties in New Hampshire to represent them in the Opioid Litigation (MDL 2804). I have taken many jury verdicts as lead trial counsel. I am qualified to contribute to the preparation for, and trial of this matter if so called upon by lead counsel.
8. I have the full backing of my firm, which has considerable resources. I devote considerable amounts of my spare time to diverse pro bono activities and would be happy to provide additional details upon request.
9. I have filed on behalf of several of my existing clients who purchased sugar. I have held off filing on behalf of many other additional existing sugar purchasing clients who are interested in joining this litigation as putative class representatives. I will provide the names, addresses, purchase history, and make them available if requested by Lead Counsel. My maintained client base numbers over five hundred thousand (500,000).

For the foregoing reasons, I respectfully request to be appointed to the PSC.

Dated: September 30, 2024

Respectfully submitted.

/s/ Robert J. Bonsignore

Robert Bonsignore (pro hac vice
forthcoming)

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Classes*